

## **REMARKS**

Applicant has carefully considered the Examiner's comments in the Office Action mailed June 23, 2006. Claims 1-14 and 27-34 remain pending in the application. No new claims have been added. Editorial revisions have been made to claims 28 and 29 to correct grammatical errors and to provide proper antecedent basis.

Claims 1, 29 and 34 has been amended to expressly name the three parties involved in the method. Claim 27 has been amended to clarify that the security message is provided to the requesting party. Support for these revisions can be found throughout the specification and figures, e.g., page 19, lines 7-15 and page 17, lines 13-23. No new matter has been added. Applicant respectfully requests reconsideration and allowance of claims 1-14 and 27-34.

### **Examiner Interview**

A telephone interview was conducted on October 17, 2006 between Examiner Moorthy and Applicant's representative, Mr. Brian Batzli (Reg. No. 32,960). Also attending the meeting was Ms. Julie Skoge (an attorney with Applicant's Attorney's firm). Applicant's claims 1, 14, 27, and 29 were discussed in view of the Flitcroft reference (U.S. Patent No. 6,636,833). The Examiner indicated that more detailed consideration of the Flitcroft reference was needed in view of Applicant's arguments. Accordingly, no final agreement was reached.

Applicant has amended claims 1, 27, and 34 in response to the Examiner's comments during the Interview.

### **Claim Rejections**

Claims 1-4, 7, 8, 10-14 and 27-34 have been rejected under 35 U.S.C. §102(e) as being anticipated by Flitcroft et al., U.S. Patent No, 6,636,833 B1. Applicant respectfully traverses the rejection.

Claim 1 recites, in part, receiving a numerical identifier at a verification system from a requesting party. The requesting party obtained the numerical identifier from a transaction initiator. The method also recites receiving an identity verifier at the verification system from the requesting party. The requesting party also obtained the identity verifier from the transaction initiator.

In sharp contrast, Flitcroft fails to disclose or suggest receiving at a verification system *both* a numerical identifier and an identity verifier from a requesting party. Rather, only one number is received at the verification system from a requesting party.

In Flitcroft, multiple limited-use card numbers, which the Office Action associates with identity verifiers, are linked with a master account number, which the Office Action associates with a numerical identifier. In contrast to claim 1, the master account number is not received at the verification system from the requesting party. In fact, Flitcroft expressly teaches away from receiving the master account number at the verification system from the requesting party. Flitcroft protects the master account number by preventing the requesting party from receiving the master account number from a transaction initiator. See *Flitcroft*, column 8, line 64 to column 9, line 2. The requesting party, therefore, never has the master account number to send to the verification system.

A particular advantage for the merchant is that since they [sic] are never in possession of the master credit card number or indeed, in many instances, of the master credit card, they have no responsibility for security to the master credit card holder.

*Flitcroft*, col. 23, lines 2-6 (emphasis added).

The Office Action notes that the verification system in Flitcroft can receive both the master account number and a limited-use card number from the *transaction initiator*. See *Flitcroft*, column 27, lines 5-8. However, one skilled in the art would not be motivated to modify the Flitcroft reference to receive at the verification system both the master account number and the limited-use card number from a *requesting party*. As noted above, one advantage of Flitcroft is that the requesting party never obtains the master account number.

For at least these reasons, therefore, Flitcroft does not anticipate or suggest claim 1. Claims 2-4, 7, 8, 10-13 depend from claim 1 and are allowable for at least the same reasons. Applicant asserts the rejection is overcome. Withdrawal of the rejection and allowance of claims 1-4, 7, 8, 10-13 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 14 recites, in part, a method including receiving instructions from a registered user designating categories of transactions that require an identity verifier and designating categories of transactions that do not require an identity verifier.

In contrast, Flitcroft fails to disclose or suggest designating categories of transactions that do not require an identity verifier. Rather, Flitcroft identifies two categories of transactions: remote transactions and card-present transactions. Both transaction categories in Flitcroft require an identity verifier (i.e., the registered user uses the limited-use credit card number associated with the registered user's master account number regardless of the category of transaction). See Flitcroft, col. 6, line 66-col. 7, line 16.

For at least these reasons, Flitcroft does not anticipate or suggest claim 14. Applicant asserts the rejection is overcome. Withdrawal of the rejection and allowance of claim 14 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 27 recites, in part, a method including transmitting to a requesting party any corresponding security message associated with an identity verifier received from the requesting party to allow the requesting party to view the corresponding security message provided by the registered user. Transmitting the security message to the requesting party is advantageous because the requesting party is able to independently determine whether the transaction details are in accordance with the security message.

In contrast, Flitcroft fails to disclose or suggest transmitting to a requesting party any corresponding security message associated with a received identity verifier to allow the requesting party to view the corresponding security message. Rather, all security limitations are handled by the verification system. See *Flitcroft*, column 23, lines 16-17. The requesting party is merely provided with authorization to continue the transaction if the verification system determines that the limitations are met. See *Flitcroft*, column 23, lines 21-23.

For at least these reasons, Flitcroft does not anticipate or suggest claim 27. Claim 28 depends from claim 27 and is allowable for at least the same reasons. Applicant asserts the rejection is overcome. Withdrawal of the rejection and allowance of claims 27-28 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 29 recites, in part, a method including transmitting to each registered user at least two identity verifiers associated with the registered user. Each of the identity verifiers enables

the registered user to verify to a requesting party a numerical identifier from a list of numerical identifiers. Each of the identity verifiers is capable of verifying the selected numerical identifier. The ability of each identity verifier to verify the selected numerical identifier is advantageous because the registered user has the freedom to mix and match different numerical identifiers and identity verifiers on the list.

In contrast, Flitcroft fails to disclose or suggest transmitting to each registered user at least two identity verifiers, each of which is capable of verifying a selected numerical identifier from a list of numerical identifiers. Rather, Flitcroft discloses transmitting to a registered user one or more limited-use credit card numbers associated with a single master account of the registered user. The limited-use credit card numbers do not enable the registered user to verify the master account number to a requesting party. As discussed above, the requesting party in Flitcroft never obtains the master account number. Rather, the limited-use credit card numbers only identify the master account number to the verification system.

For at least these reasons, Flitcroft does not anticipate or suggest claim 29. Claims 30-32 depend from claim 29 and are allowable for at least the same reasons. Applicant asserts the rejection is overcome. Withdrawal of the rejection and allowance of claims 29-32 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 33 recites, in part, a system including a database configured to associate each of multiple registered users with a corresponding list of the at least one numerical identifier. The database also is configured to associate each of the at least two identity verifiers with the corresponding registered user. Each of the identity verifiers enables the registered user to verify to requesting parties any numerical identifier selected from the list by the registered user. Each of the identity verifiers is capable of verifying the selected numerical identifier in any one transaction.

Applicant asserts Flitcroft fails to anticipate claim 33 for at least the same reasons as discussed above with respect to claim 29. Withdrawal of the rejection and allowance of claim 33 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 34 recites, in part, a verification system including a communication device configured to receive both a numerical identifier and an identity verifier from a requesting party, the requesting party having obtained the numerical identifier and the identity verifier from a transaction initiator.

Applicant asserts Flitcroft fails to anticipate or suggest claim 34 for at least the same reasons as discussed above with respect to claim 1. Withdrawal of the rejection and allowance of claim 34 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 5 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Flitcroft, as applied to claim 1 above, and further in view of Kuhns et al., U.S. Patent No, 6,047,281. Applicant respectfully points out that U.S. patent number 6,047,281 is issued to Wilson et al., and not to Kuhns et al. The previously cited Kuhns reference is U.S. patent number 5,224,173. As discussed in the previous responses, because columns 16 and 17 in the Wilson patent include only the claims, Applicant assumes that the Office Action meant to reject claim 5 over Flitcroft in view of U.S. Patent No. 5,224,173 to Kuhns et al. (hereinafter, "Kuhns"). Applicant respectfully traverses the rejection.

Claim 5 depends from claim 1 and is allowable over Flitcroft for at least the same reasons as discussed above with respect to claim 1. Applicant asserts Kuhns does not overcome the shortcomings of Flitcroft. Kuhns fails to disclose or suggest determining whether a received identity verifier is within a list of identity verifiers linked to a received numerical identifier. Rather, received physical characteristics in Kuhns narrow down which fingerprints in a database are compared to received fingerprint so that a more efficient search can be performed.

For at least these reasons, Flitcroft would not lead a person having skill in the art to the invention of claim 1, even in view of Kuhns. Claim 5 is allowable for at least the same reasons. Withdrawal of the rejection and allowance of claim 5 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserves the right to make additional arguments if necessary.

Claims 6 and 9 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Flitcroft, as applied to claim 1 above, and further in view of Shkedy U.S. Patent No. 6,236,972. Applicant respectfully traverses the rejection.

Claim 6 and 9 depend from claim 1 and are allowable over Flitcroft for at least the same reasons as discussed above with respect to claim 1. Shkedy does not overcome the shortcomings of Flitcroft. Shkedy also fails to disclose or suggest determining whether a received identity verifier is within a list of identity verifiers linked to a received numerical identifier. Rather, Shkedy is directed towards a system for buying and selling mutual funds.

For at least these reasons, therefore, Flitcroft would not lead a person having skill in the art to the invention of claim 1, even in view of Shkedy. Claims 6 and 9 are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 6 and 9 is respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserves the right to make additional arguments if necessary.

### **Conclusion**


In view of the above amendments and remarks, Applicant respectfully requests a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.



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Respectfully submitted,

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